

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

VERNA IP HOLDINGS, LLC,  
Plaintiff,

v.

ALERT MEDIA, INC.,  
Defendant.

Civil Action No. 6:23-cv-00373-ADA-DTG

**JURY TRIAL DEMANDED**

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**PLAINTIFF’S MOTION TO ENLARGE TIME TO SERVE**

Verna IP Holdings, LLC (“Verna”) files this Motion to Enlarge Time to Serve Alert Media, Inc. (“Motion to Enlarge”), showing the Court that there is a good cause to grant Verna’s Motion to Enlarge because Verna has diligently attempted to serve Abercrombie numerous times in good faith.

**ARGUMENT**

Rule 4(m) allows the Court to extend time for service for an appropriate period where “good cause” exists for failure to properly serve. Here, such good cause exists because Verna has made numerous good faith attempts to serve Alert and not merely “half-hearted efforts”, as Alert complains.

**CONCLUSION**

For the foregoing reasons, Verna respectfully requests that the court grant Verna’s Motion to Enlarge.

DATED: September 20, 2023

Respectfully submitted,

/s/ William P. Ramey, III

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that September 20, 2023, the foregoing document was served on all counsel of record who have consented to electronic service via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ William P. Ramey, III

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